

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)
JEFFREY SCOTT WINEFKA and) 15 B 32141
JENNIFER LYN WINEFKA,)
)
)
)
) Chapter 7
Debtors.)
)
)
) Honorable Judge Bruce W. Black

NOTICE OF MOTION

TO: Zane L Zielinski, Chapter 7 Trustee (via ECF)
Christopher Purcell, Attorney for Ford Motor Credit Corporation (via ECF)

PLEASE TAKE NOTICE that on February 19, 2016, at 9:00 AM, the undersigned will appear before the Honorable Bruce W. Black at the Joliet City Hall, 150 West Jefferson Street, 2nd Floor, Joliet, Illinois 60432 and will then and there present **DEBTORS' MOTION TO DELAY ENTRY OF DISCHARGE TO FILE REAFFIRMATION AGREEMENT WITH FORD MOTOR CREDIT CORPORATION THROUGH AND INCLUDING FEBRUARY 19, 2016**, at which time you may appear if you so choose.

Certificate of Service

I, Paul M. Bach, hereby certify that I caused a copy of this notice to be served, via ECF to Zane Zielinski (Chapter 7 Trustee) and Christopher Purcell (Attorney for Ford Motor Credit Corporation) and attached Motion upon the above parties on February 19, 2016, before the hour of 5:00 p.m. from the office located at 900 Jorie Blvd., Ste 150, Oak Brook, IL 60523.

BY: /S/ PAUL M. BACH
SULAIMAN LAW GROUP
COUNSEL FOR DEBTOR(S)
900 JORIE BOULEVARD, SUITE 150
OAK BROOK, IL 60523
PHONE: (630) 575-8181
FAX: (630) 575-8188
ATTORNEY NO: 6209530

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**DEBTORS' MOTION TO DELAY ENTRY OF DISCHARGE TO FILE
REAFFIRMATION AGREEMENT WITH FORD MOTOR CREDIT CORPORATION
THROUGH AND INCLUDING FEBRUARY 19, 2016**

NOW COMES, Jeffrey Scott Winefka & Jennifer Lyn Winefka (“Debtors”), by and through their attorneys, Sulaiman Law Group, Ltd., and pursuant to Federal Rule of Bankruptcy Procedure 4008 and requesting that this Court delay entry of the Discharge through and including February 19, 2016 in this case to allow a Reaffirmation Agreement with Ford Motor Credit Corporation and for any further relief this Court deems just.

BY: /s/ PAUL M. BACH
SULAIMAN LAW GROUP
COUNSEL FOR DEBTOR(S)
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